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LIMITED PARTNERSHIP (erroneously sued as  
ALLTECK LINE CONTRACTORS, INC.)

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Attorney for Plaintiffs J.P., a minor, by and  
through her guardian ad litem MEGANN PITTS,  
and MEGANN PITTS

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

J.P., a minor, by and through her Guardian Ad  
Litem MEGANN PITTS, and MEGANN  
PITTS, individually,

Plaintiffs,

v.

ALLTECK LINE CONTRACTORS, INC.,  
and DARREN KELLY,

Defendants.

Case No. 2:20-cv-01056-JAM-DMC

**JOINT STIPULATION FOR AN  
EXTENSION OF THE EXPERT  
DISCLOSURE DATES IN PRETRIAL  
SCHEDULING ORDER BY 75 DAYS;  
ORDER**

Plaintiffs JP and MEGANN PITTS (“Plaintiffs”), through their counsel  
Walkup, Melodia, Kelly & Schoenberger, and Defendants ALLTECK LINE  
CONTRACTORS, INC., and DARREN KELLY (hereinafter “Defendants”),  
through their counsel Klinedinst PC, hereby stipulate and seek Court approval for

the following:

**STIPULATION**

Since this Court's Status (Pre-Trial Scheduling) Order of October 8, 2020, the parties have exchanged written discovery. Although this is a motor vehicle accident case, the injuries are complex and treatment is ongoing. Many medical disciplines are involved. In this regard, the medical records are voluminous and current treatment records are still needed for review by qualified professionals before conducting independent medical examinations and preparing expert witness reports required for disclosure.

Unforeseen issues in the discovery process, and further issues associated with Covid 19, have resulted in delays in the subpoena process to obtain relevant medical records and documentation needed for expert review. This has prevented the Parties from obtaining all the pertinent records such that additional time is needed to secure the medical and educational records, perform medical examinations, and to complete expert reports.

The Parties request a 75 day continuance of all expert disclosure deadlines in order to complete additional discovery, obtain the necessary medical, education, and treatment records, and to explore the possibility of settling and/or mediating Plaintiffs' claims. The continuance will not affect the motion or trial dates. Neither the Plaintiffs nor the Defendants have sought any extensions of time for expert disclosures from this Court in the litigation of this action.

Accordingly, the parties request to modify the Scheduling Conference Order as follows:

(1) Expert Disclosure due by April 14, 2021;

(2) Rebuttal Expert Disclosure due by April 28, 2021;

SO STIPULATED.

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Walkup, Melodia, Kelly & Schoenberger

DATED: January , 2021

By: /s/  
Richard H. Schoenberger  
Plaintiffs J.P., a minor, by and through  
her guardian ad litem MEGANN  
PITTS, and MEGANN PITTS

KLINEDINST PC

DATED: January , 2021

By: /s/  
Natalie P. Vance  
Ernest L. Weiss  
W. Jason Scott  
Attorneys for Defendant  
DARREN KELLY and ALLTECK  
LIMITED PARTNERSHIP  
(erroneously sued as ALLTECK LINE  
CONTRACTORS, INC.)

**ORDER**

Accordingly, for good cause and pursuant to the above Stipulation of the Parties, IT IS HEREBY ORDERED that:

(1) Expert Disclosure due by April 14, 2021;

(2) Rebuttal Expert Disclosure due by April 28, 2021.

IT IS SO ORDERED.

DATED: January 12, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE

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